

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

<b>JUAN MORGAN,</b>	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No: <b>05-989 (RCL)</b>
	)	
	)	<b>ECF</b>
<b>MIKE JOHANNNS, <i>et al.</i></b>	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANT'S PROPOSED SCHEDULING ORDER**

Pursuant to the Court's request, Defendant Mike Johanns, Secretary, U.S. Department of Agriculture, in his official capacity, respectfully submits the following proposed Scheduling Order to govern the proceedings in this case:

1. Discovery: Defendant proposes that discovery closes 180 days after the Court enters this proposed scheduling order.
2. Initial Disclosure: Defendant proposes that the parties waive Initial Disclosures.
3. Interrogatory and Deposition: Defendant proposes that the parties are limited to 25 interrogatories, including all subparts, and 5 deposition per side.
4. Dispositive motions: Defendant proposes that dispositive motions are due 30 days after the close of discovery; oppositions are due 30 days after service of dispositive motions; and replies are due 14 days after service of any oppositions.
5. Pretrial and Trial Dates: Defendant proposes that the pretrial and trial dates should not be set until after the Court resolves all dispositive motions.

A proposed Scheduling Order is attached.

Dated: March 6, 2006.

Respectfully submitted,

/s/

KENNETH L. WAINSTEIN, D.C. BAR #451058  
United States Attorney

/s/

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Assistant United States Attorney

/s/

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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**JUAN MORGAN,**

Plaintiff,

v.

**MIKE JOHANNNS, *et al.***

Defendants.

Case No: **05-989 (RCL)**

**ECF**

**SCHEDULING ORDER**

Events	Dates
Discovery Deadline	_____, 2006, 180 days after the Court enters the Proposed Order
Initial Disclosures	Waived by the Parties
Interrogatories/Depositions	25 interrogatories (including subparts) and 5 depositions per side
Dispositive motions	_____, 2006, 30 days after close of Discovery
Oppositions	_____, 2006, 30 days after service of Dispositive Motions
Replies	_____, 2006, 14 days after service any Opposition
Pretrial Conference and Trial	Shall be set after resolution of dispositive motion

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
U.S. District Judge

Copies to:

John C. Truong, Esq.  
Counsel for Defendant

Mr. Juan Morgan  
*Pro se* plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on March 6, 2006, service of the foregoing  
Defendant's Proposed Scheduling Order was made via the Court's Electronic Case Filing  
System and by first class, postage prepaid mail to pro se plaintiff addressed as follows:

Mr. Juan Morgan  
PSC 2, Box 2814  
APO AA 34002

\_\_\_\_\_  
/s/  
JOHN C. TRUONG  
Assistant United States Attorney